

1 JANET SHERMAN (State Bar No.: 98560)
2 SHERMAN & SHERMAN
3 A Professional Law Corporation
2115 Main Street
3 Santa Monica, California 90405
4 Telephone: (310) 399-3259
Facsimile: (310) 392-9029
E-Mail: JanetSher@aol.com

5 LAW OFFICE OF ERIC HONIG
6 Eric Honig - Bar No. 140765
7 Attorney at Law
P.O. Box 10327
8 Marina del Rey, CA 90295
Telephone (310) 745-8264
Facsimile (310) 745-8267

9 Attorneys for Claimant
10 John W. Hollis

11

12 UNITED STATES DISTRICT COURT
13 EASTERN DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA, } CIV. S-05-149 DFL KJM
15 Plaintiff, } STIPULATION TO EXTEND
16 v. } TIME FOR FILING OF ANSWER
17 APPROXIMATELY \$1,200,000.00 IN } BY CLAIMANT JOHN W.
18 U.S. CURRENCY SEIZED FROM } HOLLIS PENDING
19 FIRST CALIFORNIA BANK ACCT. } DETERMINATION OF
NO. 2005638, } CLAIMANT'S MOTION FOR
APPROXIMATELY \$225,958.84 IN } CLARIFICATION AND
20 U.S. CURRENCY SEIZED FROM } RECONSIDERATION; ORDER
21 BANK OF AMERICA ACCT. NO. } THEREON
004653665607
APPROXIMATELY \$177,695.11 IN }
22 FUNDS CONNECTED TO A }
23 TRANSFER TO THE UNITED }
24 STATES OF AMERICA FROM }
BULLIVANT Houser Bailey, }
Defendants.
JOHN W. HOLLIS, }
Claimant.

1 WHEREAS claimant John W. Hollis has filed a statement of interest in this
2 action;

3 AND WHEREAS on July 18, 2006 the Court issued a Memorandum of
4 Opinion and Order in which the court 1) dismissed the claimant's claims as to the
5 approximately \$1,200,000.00 in U.S. currency seized from First California Bank
6 account no. 2005638 and approximately \$177,695.11 in funds connected to a transfer
7 to the U.S. from Bullivant Houser Bailey, 2) denied the government's motion to
8 dismiss the claimant's claim as to the defendant \$225,958.84 in U.S. currency seized
9 from Bank of America account No. 004653665607, 3) denied the claimant's motion
10 to stay the proceedings, but issued a protective order limiting discovery regarding the
11 \$225,958.84 to the issue of the claimant's Article III standing only, and 4) ordered
12 the claimant to file an answer as to the \$225,958.84 within 21 days of the order;

13 AND WHEREAS the claimant intends to file a motion for clarification and
14 reconsideration of the court's order, which will be set for hearing on September 13,
15 2006;

16 AND WHEREAS the parties agree that time should be extended for the
17 claimant to file his answer until after the court decides his motion;

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1 IT IS THEREFORE STIPULATED that the claimants' answer or other
2 responding document will not be due until thirty (30) days after the Court has issued
3 its ruling on the claimant's motion for clarification and reconsideration .

4 DATED: _____, 2006

Respectfully submitted,

5 SHERMAN & SHERMAN
A Professional Law Corporation

6 LAW OFFICE OF ERIC HONIG

7 By: _____
8

9 JANET SHERMAN
10 Attorneys for Claimant
John W. Hollis

11 DATED: _____, 2006

12 McGREGOR W. SCOTT
United States Attorney

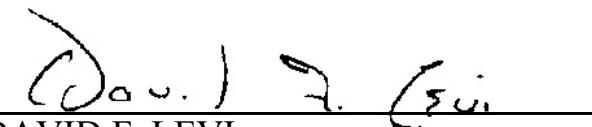
13 By: _____
14

15 Kristin Door
16 Assistant United States Attorney
17 Attorneys for Plaintiff
18 United States of America

19 **O R D E R**
20

21 IT IS SO ORDERED.
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23 DATED: 8/17/ 2006
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25 
26 DAVID F. LEVI
27 Chief United States District Judge
28

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California and am over the age of 18 and not a party to the within action. My business address is 2115 Main Street, Santa Monica, California 90405.

On _____, 2006, I served the foregoing document described as:

STIPULATION TO EXTEND TIME FOR FILING OF ANSWER BY
CLAIMANT JOHN W. HOLLIS PENDING DETERMINATION OF
CLAIMANT'S MOTION FOR CLARIFICATION AND
RECONSIDERATION; ORDER THEREON

on all interested parties in this action by placing a true copy in a sealed envelope addressed as follows:

Kristin Door
Assistant United States Attorney
United States Attorney's Office
501 I Street, Suite 10-100
Sacramento, CA 95814

I caused such envelope, to be sent in the U.S. Mail with prepaid postage affixed from Santa Monica, California to the above addressee. I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct, except as to those matters stated on information and/or belief, and as to those matters, I believe them to be true; and that this Declaration was executed at Santa Monica, California on May 12, 2006.

/s/ Cathy L. Mackerl

CATHY L. MACKERL